

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,  
Plaintiff,

v.

BRIAN FOLKS,  
Defendant.

Docket No. 5:16-cr-94-01

MOTION TO BE DEPOSED

NOW COMES Katelynn Charbonneau, by and through her attorney, Devin McLaughlin, Esq., and pursuant to Fed.R.Crim.P. 15(a)(2) moves to be deposed. Ms. Charbonneau has been detained pursuant to 18 U.S.C. § 3144. Accordingly, she is entitled to be deposed.

Ms. Charbonneau asks that the Court order that the deposition be taken tomorrow afternoon, April 27. She is currently detained, and the benefits of post-deposition release diminish daily.

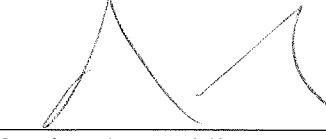
Ms. Charbonneau asks that the Court order that the transcript be prepared on the day of the deposition, or otherwise in as expedited a fashion as possible.

Ms. Charbonneau asks that the Court order that upon her review and signing of the deposition, she is to be immediately released, with reasonable conditions. If those conditions could be issued by the Court immediately for her signature at the time of her deposition, that would avoid a delay on release.

Langrock  
Sperry  
& Wool, LLP

DATED at Middlebury, Vermont this 26<sup>th</sup> day of April, 2018.

LANGROCK SPERRY & WOOL, LLP



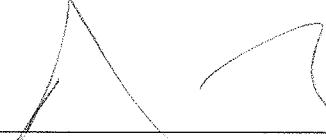
Devin McLaughlin  
PO Drawer 351, 111 S. Pleasant Street  
Middlebury, VT 05753  
dmclaughlin@langrock.com  
Phone: (802) 388-6356  
Attorney for Katelynn Charbonneau

CERTIFICATE OF SERVICE

I, Devin McLaughlin, Esq., attorney for Katelynn Charbonneau, do hereby certify that on April 26, 2018, I electronically filed with the Clerk of the Court the following document: *Motion to be Deposed* using the CM/ECF system. The CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) to all parties of record.

Dated at Middlebury, Vermont, this 26<sup>th</sup> day of April, 2018.

LANGROCK SPERRY & WOOL, LLP



Devin McLaughlin  
PO Drawer 351, 111 S. Pleasant Street  
Middlebury, VT 05753  
dmclaughlin@langrock.com  
Phone: (802) 388-6356  
Attorney for Katelynn Charbonneau